

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 04-10384-PBS
)	
DANIEL KAMEN)	

ASSENTED-TO MOTION TO CONTINUE TRIAL

The United States, by United States Attorney Michael J. Sullivan and Assistant United States Attorney Leah Foley, with the assent of counsel for defendant, Charles Rankin, moves this Court to continue the trial date in this case from April 7, 2008, for a period of thirty days or until a date that is convenient to the Court's schedule. In support of this motion, the government states:

1. The Assistant United States Attorney previously assigned to this case recently departed our office, which necessitates a short continuance so that the undersigned Assistant can review the case and be prepared for trial.
2. The parties remain engaged in plea negotiations in an effort to resolve this case short of retrial.
3. The defense assents to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Leah Foley
Leah Foley
Assistant U.S. Attorney
(617) 748-3100

Date: March 27, 2008

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
March 25, 2008

I, Leah B. Foley, Assistant U.S. Attorney, certify that I caused a copy of the foregoing to be served by electronic notice to Charles Rankin, Esq, 151 Merrimac Street, 2nd floor, Boston, MA 02114-4717.

/s/ Leah Foley
Leah Foley
Assistant U.S. Attorney